

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

WILLIAM FAMBROUGH)	CASE NO.: 1:22-CV-00992
)	
Plaintiff)	JUDGE: BRIDGET MEEHAN BRENNAN
)	
v.)	DEFENDANTS' ANSWER TO
)	PLAINTIFF'S COMPLAINT
)	
CITY OF EAST CLEVELAND, et. al.)	
)	JURY DEMAND
Defendants)	

NOW Comes the City of East Cleveland Defendants, Mayor Brandon King, Chief Scott Gardner, Law Dir. Willa Hemmons, Asst. Law Dir. Heather McCollough, Officer Mark Allen, Comm. Kenneth Lundy, Off. Andrew Majercik, Sgt. William Nevels, and Kyle Wood, by and through Its counsel, Atty. Willa Hemmons, hereby respectfully submits the following Answer to Plaintiff's Complaint and Jury Demand ("Complaint") as follows:

INTRODUCTION

1. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 1.
2. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 2.
3. The allegations contained in Paragraph 3 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.

4. The allegations contained in Paragraph 4 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.
5. Defendants deny the allegations in Paragraph 5.
6. Defendants deny the allegations in Paragraph 6.
7. The allegations contained in Paragraph 7 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.

JURISDICTION AND VENUE

8. Defendants state that Paragraph 8 contains legal conclusions to which no answer is required and therefore denies the same.
9. Defendants state that Paragraph 9 contains legal conclusions to which no answer is required and therefore denies the same.
10. Defendants state that Paragraph 30 contains legal conclusions to which no answer is required and therefore denies the same.

PARTIES

11. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 11.
12. Defendants admit Paragraph 12.
13. The allegations contained in Paragraph 13 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.

14. The allegations contained in Paragraph 14 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.
15. The allegations contained in Paragraph 15 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.
16. The allegations contained in Paragraph 16 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.
17. The allegations contained in Paragraph 4 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.
18. The allegations contained in Paragraph 4 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.
19. The allegations contained in Paragraph 19 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.
20. The allegations contained in Paragraph 20 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.

21. The allegations contained in Paragraph 21 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.
22. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 22 regarding any purported John Does 1 – 10; as to the purported actions supposedly attributable to such anonymous persons, Defendants deny same.

FACTS

23. Defendants admit the allegation in Paragraph 23.
24. The allegations contained in Paragraph 24 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.
25. The allegations contained in Paragraph 25 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.
26. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph 26 and therefore denies the same.
27. The allegations contained in Paragraph 27 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.

28. The allegations contained in Paragraph 28 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.

29 The allegation contained in Paragraph 29 is a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny the allegations set forth and deny any further characterization thereof.

30 The allegations contained in Paragraph 30 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.

31 The allegations contained in Paragraph 31 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.

32. The allegations contained in Paragraph 32 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.

33. Defendants admit Paragraph 33.

34. The allegations contained in Paragraph 34 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.

35. Defendants admit Paragraph 35.

36. The allegations contained in Paragraph 36 are a restatement of Plaintiff's case to which no response is required. To the extent a response is deemed necessary, Defendants deny that there is a relevant or material comparison.

37. Defendants admit Paragraph 37.

38. Paragraph 38 attempts to state a legal conclusion to which no response is necessary. .

39 Defendants admit Paragraph 39.

40. Defendants deny Paragraph 40.

41. Defendants are without knowledge or information sufficient to form a belief as to the truth of the allegations in Paragraph. 41.

42 through 268. The allegations contained in Paragraphs 42 through 268 are restatements of Plaintiff's case to which no response is required. To the extent responses are deemed necessary,. Defendants deny that there are relevant or material comparisons; and; inasmuch as those paragraphs consist of a panoply of concocted hyperbole, Defendants again deny the allegations set forth therein and deny any further characterization thereof.

RELIEF REQUESTED

WHEREFORE, Defendants deny that Plaintiff is entitled to the relief requested, or any relief whatsoever, in the unnumbered "**WHEREFORE**" clause following Paragraph 268, including subparts (A) through (G). Each and every allegation not heretofore expressly admitted or denied is denied as being undeserving of any relief.

JURY DEMAND

Pursuant to Fed.R.Civ.P 38 a Jury Trial on the within matter is hereby demanded.

Respectfully submitted,

CITY OF EAST CLEVELAND

/s/ Willa M. Hemmons
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CERTIFICATE OF SERVICE

A true and accurate copy of the foregoing *City Answer* was electronically filed with the Court on this 6th day of July 2022 and that by way of the Court's electronic notification system notice of this filing was provided to all registered parties.

/s/ Willa M. Hemmons